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Congress of the United States
Washington, DC 20515

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May 4, 2007

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Federal Communications Commission
Office of the Secretary

The Honorable Kevin J. Martin
 Chairman
 Federal Communications Commission
 445 12th Street, S.W.
 Washington, D.C. 20554

Dear Mr. Chairman:

We are writing to request that the Federal Communications Commission (Commission) adhere to its February 18, 2008 sunset date for the end of the Commission's requirement that commercial mobile services provide analog service to cellular telephones. We believe the analog service rule is no longer necessary, and continuation of this requirement would undermine spectral efficiency and impose additional costs, especially on rural wireless carriers.

The Commission set the February 18, 2008 sunset date in 2002, after finding that the competitive state of mobile wireless service, nationwide coverage achieved by carriers and clear consumer demand obviated the need to maintain the analog requirement. As part of that decision, the Commission established a reasonable and achievable multi-year path toward the sunset of the analog requirement. Customers and carriers have had ample time to prepare for the transition and take action. During the past five years, wireless carriers have been transitioning their networks and customers in anticipation of the end of the analog requirement. Because of the expectation that the sunset would be implemented, wireless carriers have relatively few remaining analog customers, and the cost of continuing to operate an analog network for such few customers is, in many cases, substantial.

In addition, the continued provision of analog service prevents wireless carriers from using that spectrum more efficiently and effectively for wireless broadband services. One of the Commission's strategic goals is that "[a]ll Americans should have affordable access to robust and reliable broadband products and services." Permitting wireless carriers to reallocate spectrum currently used for analog service to the provision of broadband services will help the Commission achieve that goal.

Facilitating a more complete transition to digital service will pay dividends for public safety, as well. Digital phones give consumers access to state-of-the-art E911 location capabilities, while old analog phones do not. Digital handsets also can offer customers better voice quality, longer battery life, and GPS-navigation capabilities. Analog phones offer none of these advantages.

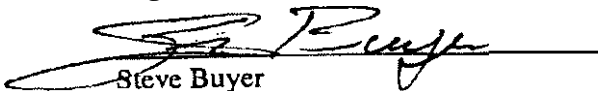
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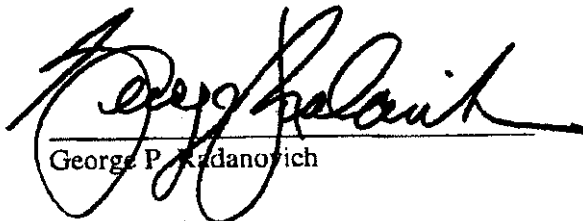
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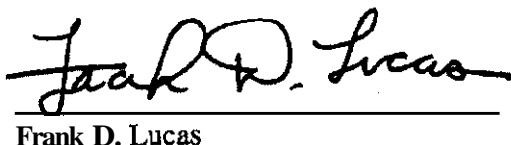
The Honorable Kevin J. Martin
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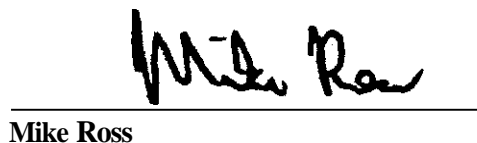

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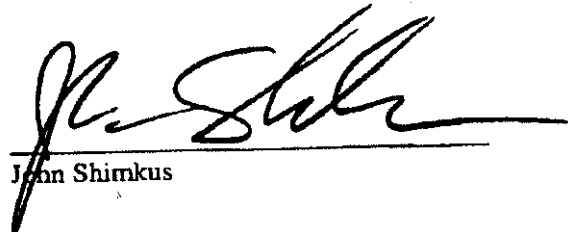

Frank D. Lucas

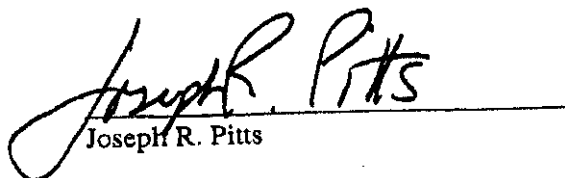

Mike Ross

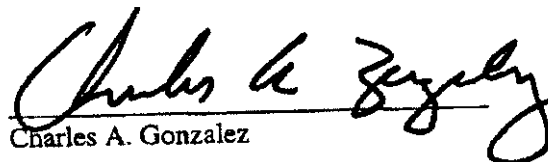

Lee Terry

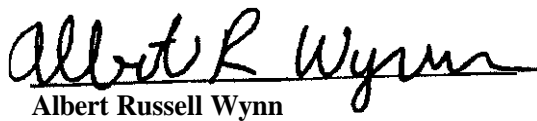

John Sullivan


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cc:

The Honorable Michael J. Copps
The Honorable Jonathan S. Adelstein
The Honorable Deborah Taylor Tate
The Honorable Robert M. McDowell

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